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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

UNITED STATES OF AMERICA,)	CR15-2062 TUC JAS (CRP)
)	
Plaintiff,)	
vs.)	MOTION TO CONTINUE TRIAL AND
)	EXTEND PLEA DEADLINE
VERONICA GUADALUPE)	
SALDIVAR,)	
)	
Defendant.)	(First Request)

It is expected that excludable delay under 18 U.S.C. §3161 will occur as a result of this motion or from an order based thereon.

Defendant Veronica Guadalupe Saldivar, through counsel, requests a continuance of the trial currently set for January 12, 2016, and an extension of the plea deadline currently set for December 24, 2015. The reason for this continuance is that counsel for the Defendant is conducting an investigation of the matter. In addition, undersigned counsel and the Government are working towards resolving this case without a trial. In order to comply with the deadlines it is imperative that this matter be continued for thirty days. In addition, if plea negotiations prove unsuccessful, Defendant will need additional time to prepare for trial. Defendant waives all time limits.

Assistant United States Attorney Christina Vejar has been contacted regarding this request and has no objection to a continuance.

1 RESPECTFULLY SUBMITTED this 24th day of December, 2015

2 DAMIANAKOS LAW FIRM, PLLC.

3 By: /s/ *ELIAS DAMIANAKOS*

4 Elias Damianakos
5 Attorney for Defendant

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7 Copy delivered electronically this date to:

8 Christina Vejar, Assistant United States Attorney
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